I. Wilson

Wilson is directed to a peripheral data acquisition, monitor, and adaptive control system in which a ***local*** personal computer (a "PC") monitors and/or controls input/output Bridge devices. To perform this monitor/control operation, the PC uses an interface device, which plugs into the PC's keyboard port (see Figure 1). The interface device is connected to the PC's keyboard, as well as to input/output Bridge devices. The input/output Bridge devices can be connected to the interface device with standard wired connections, wireless (*e.g.*, infrared, radio frequency) transmissions, or AC power-line (X-10) transmissions. The interface device receives signals from the input/output Bridge devices and translates the signals into keyboard code signals. These keyboard code signals are then transmitted to the PC, which responds exactly as if the keys were actually being typed on the keyboard. Wilson also describes how signals can be sent from the local PC to the input/output Bridge devices.

As discussed in the Background section of Applicants' specification, there are several disadvantages associated with systems, such as the one disclosed in Wilson, that use a local PC. Because the Wilson system requires a local PC to monitor/control devices, the high cost associated with the PC limits the wide-spread use of the system. Further, when updates need to be distributed to many users, each local PC needs to be updated individually.

II. Claims 1-34

Applicants respectfully request reconsideration of the rejections of Claims 1-34 because the recited remotely-located server (or application) is not taught in Wilson. In the Office Action, it was asserted that the claimed server is taught in col. 21, lines 11-24 of Wilson. However, this passage merely describes a local application that runs on a local PC. In contrast to the ***local*** PC-based system disclosed in Wilson, Claims 1-34 recite a server that is ***located remotely from the***

customer premises. In this way, the claimed invention offers several advantages over Wilson's local PC-based system. First, because a customer does not need to purchase a PC, the high-cost associated with a PC will not limit the wide-spread use of the system. Second, because the server is located remotely from the customer premises, a single server can serve multiple customers. In this way, many users can receive new features with a single update to the centralized server instead of updates to many local PCs. Third, the remotely-located server can be a more computationally-intensive processor than a standard PC, allowing more sophisticated features to be offered to a user.

In summary, because the claimed invention recites a server (or application) that is ***located remotely from the customer premises*** and Wilson merely teaches a local application running on a local PC, Wilson does not anticipate the claimed invention. Accordingly, Applicants respectfully request withdrawal of the § 102(b) rejections.

III. Claims 15-18

The claimed invention contains other elements not shown by Wilson. For example, Claims 15 and 16 recite first and second data-over-voice modems used to couple the controller with the remotely-located server. While the local PC in Wilson can use a modem, the modem is not used to communicate with a remotely-located server. The modem is merely used, for example, to remotely access the local PC, such as when a user remotely instructs the local PC to program a VCR (col. 32, lines 16-20). In any event, there is no teaching that the modem in Wilson is a ***data-over-voice*** modem. Further, Wilson does not teach the use of a premises gateway and a digital subscriber line access multiplexer, as recited in Claims 17 and 18.

IV. New Claims 35-50

Applicants have added new Claims 35-50 to add a recitation concerning the access line. Specifically, these claims recite that the access line comprises a voice channel and a data channel, which allows data communication without the interference with voice communication. Applicants submit that the claimed access line is not disclosed in Wilson. In the Office Action, it was asserted that an ac powerline or a telephone line is an access line. With respect to the telephone line, Wilson does not use the telephone line to interconnect the input/output devices with the local PC (the "server"). The input/output devices and the local PC are connected with standard wired connections, wireless (*e.g.*, infrared, radio frequency), or AC power-line (X-10) transmissions. Telephone lines are used, for example, to remotely access the local PC, such as when a user remotely instructs the local PC to program a VCR (col. 32, lines 16-20). In any event, there is no teaching that either the ac powerline or the telephone line operates with separate voice and data channels, as recited in Claims 35-50.

It is important to note that these amendments were made merely to clarify the invention. These amendments were not made for patentablility since, as discussed above, Wilson lacks every element recited in the base claims.

V. Information Disclosure Statement

Applicants note that they have not yet received a copy of the initialed PTO 1449 form submitted with the June 3, 1998 Information Disclosure Statement. Applicants request that the Examiner return the initialed 1449 form to Applicants in the next communication.

VI. Conclusion

Applicants submit that in view of the foregoing amendments and remarks, all claims pending in this application are now in condition for allowance. Reconsideration is respectfully

requested. If the Examiner has any questions regarding this response, he is invited to contact the undersigned attorney at (312) 321-4719.

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Respectfully submitted,

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